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2	Attorney for the United States, Acting Under Authority Conferred By 28 U.S.C. § 515					
3	HALLIE HOFFMAN (CABN 210020) Chief, Criminal Division					
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0	Attorneys for U	United States of America				
1	•	UNITED STATI	ES DISTRICT COURT			
12		NORTHERN DIST	RICT OF CALIFORNIA			
13		SAN JO	SE DIVISION			
14		511,00				
15	UNITED STAT	ΓES OF AMERICA,	Case No. 18-CR-00258 EJD			
16	Plaintiff	f,	ADMINISTRATIVE MOTION TO FILE PORTIONS OF DOCUMENTS UNDER SEAL			
17	v.		AND [PROPOSED] ORDER			
18		HOLMES and RAMESH				
19	"SUNNY" BAI	,				
20	Defenda	ants.				
21		NOTICE OF MOTION AN	D ADMINISTRATIVE MOTION			
22	Pursuan	at to Local Rule of Criminal Proce	dure 56-1, the United States respectfully moves for an			
23	order permitting	g the filing under seal of unredacte	ed versions of the following documents:			
24	1 L	JNITED STATES' OPPOSITION	TO DEFENDANTS' MOTION TO DISMISS			
25	S	SECOND AND THIRD SUPERSE NDICTMENT DELAY	EDING INDICTMENTS BASED ON PRE-			
26		SUPPORT OF UNITED STATES'	ATION OF AUSA ROBERT S. LEACH IN OPPOSITION TO DEFENDANTS' MOTION TO SUPERSEDING INDICTMENTS BASED ON PRE-			
27		NDICTMENT DELAY	SUFERSEDING INDICTMENTS DASED ON PRE-			
28						

ADMIN MOT. & [PROPOSED] ORDER CASE NO. 18-258 EJD

1 2		3	LEACH IN SUPPORT OF UNITI	, 2020 DECLARATION OF AUSA ROBERT S. ED STATES' OPPOSITION TO DEFENDANTS' O AND THIRD SUPERSEDING INDICTMENTS DELAY			
3		4	EXHIBIT D TO SEPTEMBER 18	, 2020 DECLARATION OF AUSA ROBERT S.			
4				ED STATES' OPPOSITION TO DEFENDANTS' O AND THIRD SUPERSEDING INDICTMENTS DELAY			
5							
6							
7	Sealing	is ap	propriate because the opposition and	d the declaration refer to and/or attach documents that			
8	are ther	re themselves sealed. Redacted versions omitting references to the sealed documents are being					
9	publicly	y filed	1.				
10		For th	nese reasons, the government submi	ts there is good cause to grant sealing.			
11	DATEI	D: Se	ptember 18, 2020	Respectfully submitted,			
12				ADAM A. REEVES			
13				Attorney for the United States, Acting Under Authority Conferred By 28			
14				U.S.C. § 515			
15				/s/			
16				ROBERT S. LEACH Assistant United States Attorney			
17				rissistant Onted States rittorney			
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$\begin{bmatrix} 20 \\ 27 \end{bmatrix}$							
28							

[PROPOSED] ORDER

The Court, having considered the government's Administrative Motion, hereby GRANTS the motion and ORDERS that unreducted versions of the following documents shall be filed under seal:

1	UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
2	SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
3	EXHIBIT C TO SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY
4	EXHIBIT D TO SEPTEMBER 18, 2020 DECLARATION OF AUSA ROBERT S. LEACH IN SUPPORT OF UNITED STATES' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS SECOND AND THIRD SUPERSEDING INDICTMENTS BASED ON PRE-INDICTMENT DELAY

IT IS SO ORDERED.

Dated: September 28, 2021

THE HONORABLE EDWARD J. DAVILA UNITED STATES DISTRICT JUDGE